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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 LAVELL ROBINSON,

16 Plaintiff,

17 vs.

18 RANDSTAD US, L.P, DOES I through X,
19 inclusive, ENTITIES I through X, inclusive,

20 Defendants.

Case No. 2:24-cv-01040-RFB-EJY

**JOINT STIPULATION OF
DISMISSAL WITH PREJUDICE**

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1 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff, Lavell
2 Robinson (“Plaintiff”) and Defendant Randstad US, LLC (“Defendant” and collectively the
3 “Parties”)), hereby stipulate and agree to the following:

4 1. On March 25, 2024, Plaintiff filed a civil action against Randstad in the Eighth
5 Judicial District Court for Clark County, Nevada, styled *Lavell Robinson v. Randstad U.S., L.P.,*
6 *et al.*, Case No. A-24-889779, wherein he alleged purported violations of the Americans with
7 Disabilities Act and other claims.

8 2. On June 3, 2024, Randstad removed this case to the U.S. District Court for the
9 District of Nevada.

10 3. On September 18, 2024, the Parties attended an Early Neutral Evaluation
11 Conference with Magistrate Judge Nancy J. Koppe, where they reached a settlement, the essential
12 terms of which were read into the record.

13 4. The Parties have now entered into a binding Settlement Agreement resolving all
14 Plaintiffs’ claims against Randstad and have stipulated to the dismissal of the case with prejudice.

15 5. Accordingly, pursuant to Rule 41(a)(1)(A)(ii), the Parties hereby stipulate to the
16 dismissal of this action with prejudice in its entirety. Each party will bear its own attorneys’ fees,
17 costs, and expenses related to this action. The Parties request that the Clerk of Court now close
18 this case.

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6. This Stipulation may be executed in any number of facsimile or electronic counterparts, each of which shall be deemed an original, and all such counterparts taken together shall be deemed to constitute one and the same instrument.

IT IS SO STIPULATED.

DATED this 23rd day of October, 2024.

DATED this 23rd day of October, 2024.

WRIGHT, FINLAY, & ZAK, LLP

/s/ Jory C. Garabedian

Jory C. Garabedian, Esq.
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/s/ Lavell Robinson

Lavell Robinson
370 E. Harmon Avenue, Apt F316
Las Vegas, NV 89169
Plaintiff, Pro Se

DATED this 23rd day of October, 2024.

KABAT CHAPMAN & OZMER LLP

/s/ Paul G. Sherman

Paul G. Sherman, Esq.
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333 S. Grand Avenue, Suite 2225
Los Angeles, CA 90071
Attorneys for Defendant Randstad US, LLC

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 25 day of October 2024